

# **EXHIBIT H**

## **Second Maxwell Declaration**

Exhibit to Declaration of Hilary Harris Klein

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA

SHAUNA WILLIAMS, et al.,

*Plaintiffs,*

v.

REPRESENTATIVE DESTIN HALL, in his official capacity as Chair of the House Standing Committee on Redistricting, et al.,

*Defendants.*

Civil Action No. 23 CV 1057

NORTH CAROLINA STATE CONFERENCE OF THE NAACP, et al.,

*Plaintiffs,*

v.

Civil Action No. 23 CV 1104

PHILIP BERGER, in his official capacity as the President Pro Tempore of the North Carolina Senate, et al.,

*Defendants.*

**SECOND AFFIDAVIT OF DEBORAH DICKS MAXWELL  
PRESIDENT OF THE NORTH CAROLINA STATE CONFERENCE  
OF THE NAACP**

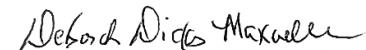
October 2, 2024

I, Deborah Dicks Maxwell, swear under penalty of perjury that the following information is true to the best of my knowledge and state as follows:

1. I previously provided a declaration on September 23, 2024 in this matter.
2. Since providing that declaration, I have been made aware that Legislative Defendants have expressed an intent to depose any members that we identify to them as living in challenged areas of the state and who we have not otherwise disclosed as possible witnesses in this matter. I am unaware of this ever occurring in any of our legal challenges in North Carolina, and I am certain it will have a negative adverse impact on people's willingness to affiliate with the North Carolina NAACP.
3. Our membership includes individuals who are already marginalized within their communities, and who have experienced adverse treatment because of their race. For example, in 2022, prominent members of the North Carolina NAACP were targeted in a racially-motivated arson in their family homes, which local law enforcement failed to fully investigate.<sup>1</sup> One of our largest and most active local branches, Raleigh-Apex, has recently received threatening phone calls. Past North Carolina State Conference presidents have received death threats. Based on these and other experiences, I believe specific members whose identities are exposed could face significant criticism risk for being associated with a social justice civil rights organization. This is precisely why we so closely protect our membership information, especially with the polarization in the current political climate. The North Carolina NAACP exists to promote the interest of its members in a manner that will protect those members from risk of retaliation.
4. Our membership are all volunteers and includes many individuals who are low-income and work full time. Being deposed would likely put a severe burden on them from a time and financial perspective, and the experience of being deposed would very likely be seen as harassment and an intent to dissuade them from continuing their affiliation with the North Carolina NAACP. If such depositions were required, I am certain it would decrease membership in our organization and, for the reasons I stated in my first declaration, would have a severe impact on our ability to meet our organizational goals.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on: October 2, 2024.

  
Deborah Dicks Maxwell

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<sup>1</sup> <https://www.theroot.com/black-nc-family-targeted-in-two-racially-motivated-arsos-1849036278> (last accessed October 2, 2024).